

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

RYAN BRESLOW, et al.,

Plaintiffs,

v.

MARK PHILLIPS, et al.,

Defendants.

DECLARATION OF MIKHAIL RADIN

I, Mikhail Radin, declare as follows:

1. I am over the age of eighteen and am competent to testify as to the matters herein.

The following is based on personal knowledge unless otherwise noted.

2. In March 2022, Mark Phillips (“Phillips”) recruited me to work for the unincorporated nonprofit association known as Movement DAO (“Movement”). Phillips explained that Movement was a new decentralized autonomous organization (“DAO”) that would provide for the funding of social movements through blockchain technology and the formation of other DAOs. I flew to Miami where I met with Phillips and Jon Gordon, and also worked out of the house in which they were living and working.

3. I began working as a core blockchain developer at Movement on or about April 1, 2022, where I help develop Movement’s technical blockchain architecture.

4. I am paid at an annual rate of \$400,000, and I work in excess of forty hours per

week for Movement.

5. I am a member of Movement's Discord channel, but I am not an active participant in the Discord as I devote most of my efforts relating to Movement to development work.

6. Around the time of Movement's launch, I was active in Movement's community, where I participated in discussions regarding Movement's affairs on Discord.

7. In June 2022, I met with Jon Gordon, David Steen (another active member of Movement's community), and several other members of the Movement community in New York to discuss Movement's future operations.

8. As part of my compensation for my development work, Phillips and Benjamin Reed ("Reed") have transferred funds into the Movement Gnosis on my behalf such that I have governance tokens in Movement.

9. In August 2022, Movement's community began voting on proposed actions (known as MIPs) through the Snapshot voting process. I knew that members of the Movement community voted on MIPs relating to Movement's governance on Snapshot. I understood that those votes provided Movement with authority to take action in accordance with Movement's governing documents, including its GitBook and its Guiding Principles. Any assertion that Snapshot voting was merely a beta version is inconsistent with my understanding of Movement members utilized Snapshot voting.

10. As a contributor to and active member of Movement, Phillips and Reed invited me to join an emergency committee (the "Committee") in January 2023. I understood the Committee to be a way for Movement stakeholders, including internal developers, large

contributors, small contributors, and independent members of the community, to help guide Movement's governance following efforts by Ryan Breslow, Alex Fine, and Jon Gordon, to take their money out of Movement in defiance of Movement's governing documents, including its GitBook and Guiding Principles. I attended a Committee meeting on January 26, 2023.

11. After the foregoing Committee meeting, as well as two other Committee meetings I did not attend, Reed submitted MIPs reflecting the Committee's recommendations to the Movement community to vote on via the Snapshot voting system. I understand those MIPs to be valid grants of authority to Movement by its members, which includes me, as I voted for MIP-0014 and every MIP that followed. Prior to MIP-0013, I was aware that members of the community voted for MIPs on Snapshot, and I did not disapprove of any of the proposals, but I did not vote on those earlier proposals.

12. As a contributor to and member of Movement, I believe that any transfer of funds on the part of Phillips and Reed were done in accordance with authority Movement's members provided them through various MIPs and for the proper purpose of funding Movement's continued operations and development.

13. I continue to this day to perform development work for Movement, which I believe is necessary for Movement's continued operations and development.

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I, Mikhail Radin, declare under penalty of perjury that the foregoing is true and correct
to the best of my knowledge.

Dated: Brooklyn, New York, March 17, 2023

DocuSigned by:

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Mikhail Radin